JAN 2 2 1986

Amland Corporation Mishawaka, Indiana IND 981 091 515

Joseph M. Boyle, Chief IL/IN Unit, RCRA Enforcement

Hak Cho, Chief IN Unit, Technical Programs Section

A RCRA oversight inspection was performed on December 12, 1985. In preparation for the oversight activity, a review of Amland's Part A Permit Application (dated 7/2/85) indicated the process code "D83" or disposal in a surface impoundment. During the oversight inspection, it became clear that a closure plan had been approved by the Division of Land Pollution Control of the Indiana State Board of Health on October 29, 1985. The closure plan involves mixing of wastewater treatment residue with a stabilizing agent, such as kiln dust, prior to consolidation and capping activities. This procedure clearly involves "treatment" and thus necessitates the addition of one or more treatment process codes (TO1, TO2, TO4) to Amland's Part A Permit Application. Exactly which process code(s) should be added depends on the specific procedure(s) used during closure implementation. The approved closure plan is not specific enough to allow a determination: "mixing...either by earthmoving equipment or an out of basin mechanical mixing device (such as a pug mill)." In view of this activity, I recommend that you advise Amland to submit the revised Part A required by 40 CFR 270.72.

5HE-12:Cooper:1r:6-4464:1/17/86

	TYPIST	AUTHOR	GINER STAFF	UNIT CHREE	SECTY	SECT. CHIEF	CHAIF	11.0 92
INT. DATE	1/21/86	JC 1/21/86		JmB 1/22/86	1-2286	WEM		

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